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INDUSTRIAL

Subject:

Georgia-Pacific Corporation Time Critical Removal Action Monthly Progress
Report #2

Date:

January 24, 2007

Dear Mr. Chummar:

Contact:

Patrick N. McGuire

Attached is the second monthly progress report for the Time Critical Removal Action (TCRA) at the Georgia-Pacific Corporation (Georgia-Pacific) Kalamazoo Mill Property and the former Hawthorne Mill Property (collectively referred to as the Mill Properties). The Mill Properties are associated with the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This report has been prepared pursuant to the Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-'07-C-858, and covers activities from December 16, 2006 through January 14, 2007.

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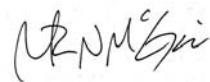
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B0066105.001

Sincerely,

ARCADIS of New York, Inc.



Patrick N. McGuire
Associate

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I. Significant Developments

Actions Performed

- Continued removal activities at the Oxbow Area, a small quantity of material remains in the Michigan Department of Transportation (MDOT) right-of-way and excavator turnaround pad.
- To date, approximately 14,556 cubic yards of soil/residuals have been removed from the Oxbow Area.
- Continued air and dust monitoring programs, in accordance with the *Time Critical Removal Action Work Plan for the Refuse Area at the Georgia-Pacific Corporation Kalamazoo Mill Property and the Oxbow Area at the Former Hawthorne Mill Property* (TCRA Work Plan).
- Paint filter tests on excavated material were conducted during rain events – no free liquid was observed during the tests.
- On December 16, 2006 began removal activities at the Refuse Area;
- On December 16, 2006 began turbidity monitoring 100 feet upstream and downstream of the Refuse Area in accordance with the TCRA Work Plan.
- To date, approximately 11,332 cubic yards of soil/residuals have been removed from the Refuse Area.
- During the week of December 18, 2006 performed a global positioning system (GPS) survey of the Oxbow removal area to stake additional sample verification points.
- On December 20 and 21, 2006 and January 5, 9, and 10, 2007 conducted additional verification soil sampling based on GPS survey, and submitted the samples to Severn Trent Laboratories (STL) for polychlorinated biphenyl (PCB) analysis with twenty percent of the verifications samples selected for Target Compound List/Target Analyte List (TCL/TAL) constituent analysis.
- Cleaned public roads during material transport, as necessary.
- Encountered a number of sealed and open drums at the Refuse Area, collected soil samples from adjacent soils and relocated the drums into overpacks and a lined roll-off bin.
- Conducted air sampling using photoionization detector in response to the drum discovery, results were below action levels.
- Segregated drums, drum remnants, and other questionable materials encountered during removal activities for future characterization and disposal at an appropriate facility.
- On December 28, 2006 collected samples of questionable materials (from Refuse Area and Transformer Pad Area) and submitted the samples to STL for PCB analysis.
- Continued consolidation and grading activities at A-Site.
- Transported sand to A-Site to help with the stabilization of saturated material, and to the Oxbow Area to improve truck access.

- Monitored weather conditions daily to anticipate potential inclement weather.
- During the week of January 8, 2007 developed a traffic plan to coordinate truck traffic with mill demolition activities.
- Made improvements to the A-Site access road to reduce occurrence of mud on public roads.
- On January 12, 2007 received results from STL on the oxbow water and the treated water in the onsite storage tanks, all were below PCB action levels identified in the TCRA Work Plan.
- On January 12, 2007 discharged 18,689 gallons of treated water in the onsite storage tanks into Davis Creek after notifying USEPA.

Problems Encountered

- Water ponding in the Oxbow Area.

Analytical Data Received

- Analytical data for the air samples collected during the previous reporting period (taken three times daily, in accordance with the TCRA Work Plan) are presented in Table 1. All results are below the criteria set forth in the TCRA Work Plan. The air samples submitted for analysis during this reporting period, for which there are currently no validated data, are also identified in Table 1.
- Analytical data for the verification soil sampling conducted during the previous reporting period are presented in Table 2. PCBs were not detected in the eight samples submitted. The verification soil samples submitted for analysis during this reporting period, for which there are currently no validated data, are also identified in Table 2. Figure 1 shows sample locations and results.

II. Developments Anticipated

Schedule of Actions to be Performed

- Begin backfill activities at the Oxbow Area.
- Continue to excavate, load, and transport residuals/materials from the Refuse Area to A-Site. Questionable items will be removed, segregated and characterized as needed.
- Continue to consolidate and grade material relocated to A-Site.
- Continue air and dust monitoring programs.
- Continue turbidity monitoring of the Kalamazoo River 100 feet upstream and downstream of the Refuse Area.

Anticipated Problems

- Ponding of water during cleanup of the Refuse Area.

Planned Resolutions of Past or Anticipated Problems

- The mixture of sand with Oxbow Area and A-Site soils/residuals has served to successfully stabilize the saturated materials, and increase production.
- Per USEPA request, collect and submit samples of the water ponding in the Oxbow Area for TCL/TAL analyses to determine what actions can be taken for water management in this area.

Table 1. Air Monitoring Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/m ³)
G53080	AST-PUF-PRE	11/16/06	0.0024
G53081	HWY-PUF-PRE	11/16/06	0.0117
G53082	AST-PUF-001	11/28/06	0.0045
G53083	HWY-PUF-001	11/28/06	0.0012
G53084	BKG-PUF-001	11/28/06	0.0009
G53085	AST-PUF-002	11/29/06	0.0025
G53086	HWY-PUF-002	11/29/06	0.0061
G53087	BKG-PUF-002	11/29/06	0.0035
G53088	AST-PUF-003	11/30/06	0.0023
G53089	HWY-PUF-003	11/30/06	0.0092
G53090	BKG-PUF-003	11/30/06	0.0034
G53091	AST-PUF-004	12/1/06	0.0005
G53092	HWY-PUF-004	12/1/06	0.0022
G53093	BKG-PUF-004	12/1/06	0.0004
G53094	AST-PUF-005	12/2/06	0.0008
G53095	HWY-PUF-005	12/2/06	0.0011
G53096	BKG-PUF-005	12/2/06	0.0004
G53097	AST-PUF-006	12/5/06	0.0005
G53098	HWY-PUF-006	12/5/06	0.0008 J
G53099	BKG-PUF-006	12/5/06	0.0009
G53100	AST-PUF-007	12/6/06	0.0004
G53101	HWY-PUF-007	12/6/06	0.0017
G53102	BKG-PUF-007	12/6/06	0.0008
G53103	AST-PUF-008	12/7/06	0.0005
G53104	HWY-PUF-008	12/7/06	0.0018
G53105	BKG-PUF-008	12/7/06	0.0005
G53106	AST-PUF-009	12/8/06	0.0003
G53107	HWY-PUF-009	12/8/06	0.0012 J
G53108	BKG-PUF-009	12/8/06	ND
G53109	AST-PUF-010	12/9/06	ND
G53110	HWY-PUF-010	12/9/06	0.0012 J
G53111	BKG-PUF-010	12/9/06	ND
G53018	BKG-PUF	12/12/06	0.0008
G53019	HWY-PUF	12/12/06	0.0027
G53020	AST-PUF	12/12/06	0.0015
G53030	BKG-PUF	12/13/06	ND
G53031	HWY-PUF	12/13/06	0.0015
G53032	AST-PUF	12/13/06	0.0033
G53033	HWY-PUF	12/14/06	0.0026
G53034	AST-PUF	12/14/06	0.0008
G53035	BKG-PUF	12/14/06	0.0017
G53036	HWY-PUF	12/15/06	0.0029
G53037	AST-PUF	12/15/06	0.0013
G53038	BKG-PUF	12/16/06	0.0003
G53039	HWY-PUF	12/16/06	0.0027
G53040	AST-PUF	12/16/06	0.0015 J

Table 1. Air Monitoring Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/m ³)
G53041	BKG-PUF	12/19/06	0.0005
G53042	HWY-PUF	12/19/06	0.0019
G53043	AST-PUF	12/19/06	0.0007
G53044	BKG-PUF	12/20/06	ND
G53045	HWY-PUF	12/20/06	0.0020
G53046	AST-PUF	12/20/06	ND J
G53067	BKG-PUF	12/21/06	0.0027
G53068	HWY-PUF	12/21/06	0.0020
G53072	BKG-PUF	12/22/06	0.0005
G53073	HWY-PUF	12/22/06	0.0026
G53074	BKG-PUF	12/28/06	0.0009 J
G53075	HWY-PUF	12/28/06	0.0017
G53077	BKG-PUF	12/29/06	0.0007
G53078	HWY-PUF	12/29/06	0.0022
G53079	AST-PUF	12/29/06	0.0011 J
G53112	BKG-PUF	12/30/06	–
G53113	HWY-PUF	12/30/06	–
G53114	AST-PUF	12/30/06	–
G53117	BKG-PUF	1/4/07	–
G53118	HWY-PUF	1/4/07	–
G53119	AST-PUF	1/4/07	–
G53120	BKG-PUF	1/5/07	–
G53121	HWY-PUF	1/5/07	–
G53122	AST-PUF	1/5/07	–
G53125	BKG-PUF	1/6/07	–
G53126	HWY-PUF	1/6/07	–
G53127	AST-PUF	1/6/07	–
G53128	BKG-PUF	1/9/07	–
G53129	HWY-PUF	1/9/07	–
G53130	AST-PUF	1/9/07	–
G53139	BKG-PUF	1/10/07	–
G53140	HWY-PUF	1/10/07	–
G53141	AST-PUF	1/10/07	–
G53147	BKG-PUF	1/11/07	–
G53148	HWY-PUF	1/11/07	–
G53149	AST-PUF	1/11/07	–

Notes:

- = These samples were submitted for analysis this reporting period. This data will be presented in the next monthly progress report after the validation process has been completed.
- ND = Analyte was not detected.
- J = The compound was positively identified; however, the associated numerical value is an estimated concentration only.

Table 2. Verification Soil Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Sample ID	Sample Location	Sample Date	PCB Concentration (µg/Kg)
G53021	Oxbow 142	12/12/06	ND
G53022	Oxbow 104	12/12/06	ND
G53023	Oxbow 105	12/12/06	ND
G53024	Oxbow 83	12/12/06	ND
G53025	Oxbow 84	12/12/06	ND
G53026	Oxbow 86	12/12/06	ND
G53027	Oxbow 68	12/12/06	ND
G53028	Oxbow 47	12/12/06	ND
G53029	Oxbow 47 DUP	12/12/06	ND
G53047	Oxbow 44	12/20/06	–
G53048	Oxbow 12	12/20/06	–
G53049	Oxbow 10	12/20/06	–
G53050	Oxbow 26	12/20/06	–
G53051	Oxbow 59	12/20/06	–
G53052	Oxbow 8	12/20/06	–
G53053	Oxbow 6	12/20/06	–
G53054	Oxbow 22	12/20/06	–
G53055	Oxbow 21	12/20/06	–
G53056	Oxbow 21 DUP	12/20/06	–
G53057	Oxbow 37	12/20/06	–
G53058	Oxbow 35 MS/MSD	12/20/06	–
G53059	Oxbow 54	12/20/06	–
G53060	Oxbow 52	12/20/06	–
G53061	Oxbow 18	12/20/06	–
G53062	Oxbow 17	12/20/06	–
G53063	Oxbow 1	12/20/06	–
G53064	Oxbow 2	12/20/06	–
G53065	Oxbow 2 DUP	12/20/06	–
G53066	Oxbow 3	12/20/06	–
G53069	Oxbow 45	12/21/06	–
G53070	Oxbow 156	12/21/06	–
G53071	Oxbow 173	12/21/06	–
G53076	Soil Near Drum Refuse	12/28/06	–
G53124	Soil Near Transformer Area	1/5/07	–
G53131	Oxbow 95	1/9/07	–
G53132	Oxbow 95 DUP	1/9/07	–
G53133	Oxbow 94	1/9/07	–
G53134	Oxbow 75 MSDS	1/9/07	–
G53135	Oxbow 96	1/9/07	–
G53136	Oxbow 98	1/9/07	–
G53137	Oxbow 157	1/9/07	–
G53138	Oxbow 158	1/9/07	–
G53142	Oxbow 144	1/10/07	–
G53143	Oxbow 89	1/10/07	–
G53144	Oxbow 162	1/10/07	–

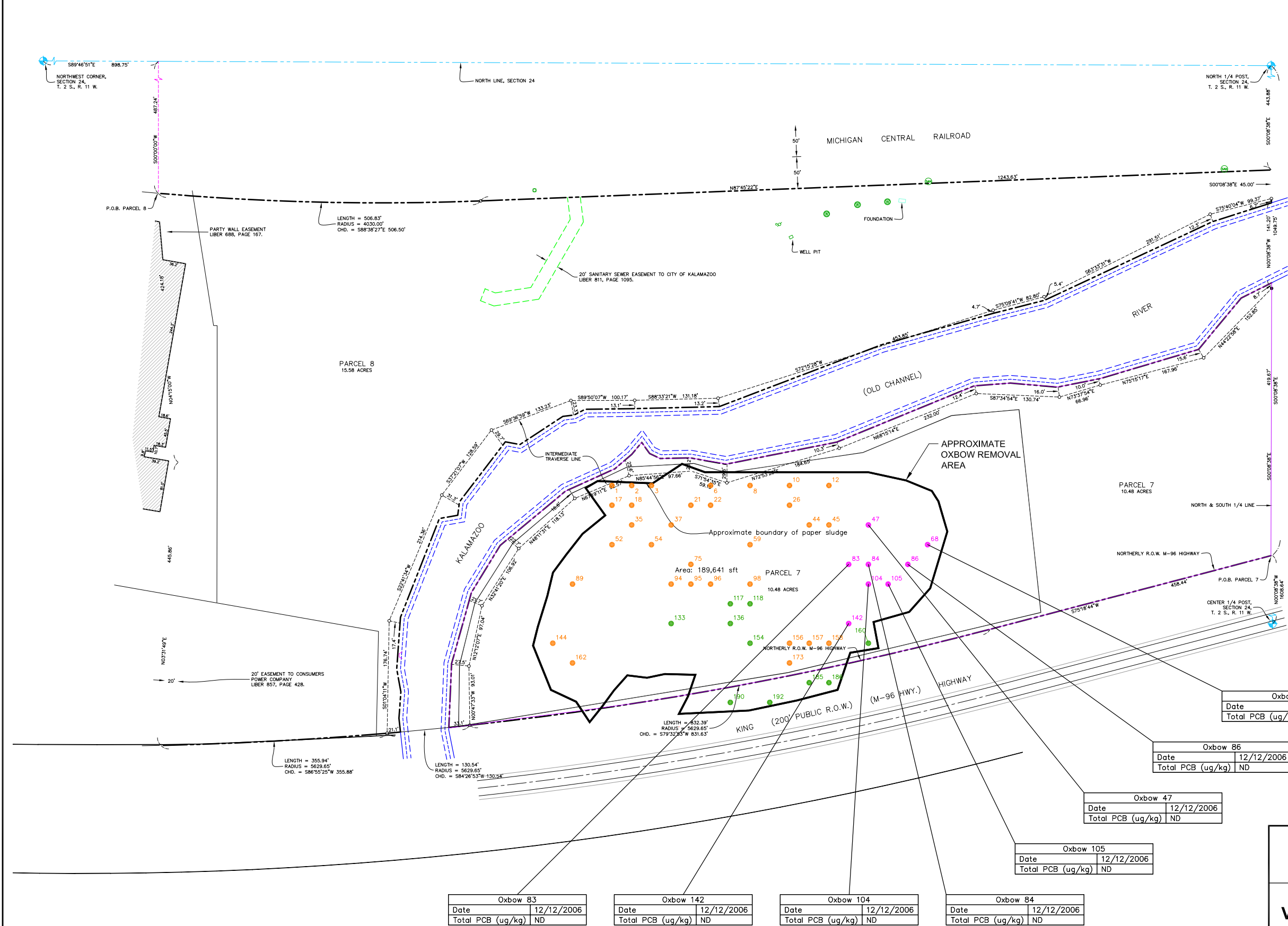
Table 2. Verification Soil Sample Results, Time Critical Removal Action – Kalamazoo Mill and Former Hawthorne Mill Properties, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Notes:

- = These samples were submitted for analyses this reporting period. This data will be presented in the next monthly progress report after the validation process has been completed.
- ND = Analyte was not detected.

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GEORGIA-PACIFIC CORPORATION
KALAMAZOO MILL PROPERTY
TIME CRITICAL REMOVAL ACTION

VERIFICATION SOIL SAMPLE RESULTS

